DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814 (916) 455-6907



July 31, 1981

ALL-COUNTY LETTER NO. 81-80

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FOOD STAMP PROGRAM FORM MODIFICATION POLICY

REFERENCE:

This letter transmits for your information the Food Stamp Program Form Modification Policy. The attached document is an expansion of the Form Modification Policy transmitted in Attachment 3 of All-County Letter 80-66, dated November 5, 1980. This expanded policy is provided to assist counties in identifying those state forms which may be modified and contains the standards by which modification requests will be evaluated.

It is the intent of this policy to provide flexibility to meet individual county needs, while ensuring that program goals are met. To assist the Food Stamp Program Management Branch (FSPMB) in meeting this intent, input was obtained from the CWDA Food Stamp Committee, the CWDA Subcommittee on Food Stamp Forms, and the Case Data Executive Committee. The FSPMB appreciates the contribution of each of these groups.

Appendix 3 of the policy contains form-specific modification criteria for the 16 state-required forms which were previously transmitted for implementation by All-County Letters 80-66 and 81-47, dated November 5, 1980 and April 30, 1981, respectively. In the future, as forms are designated and transmitted for implementation by All-County Letter, the form-specific modification criteria will be included in the package. In addition, this policy, as well as all designated forms, their instructions, and their modification criteria, will be incorporated into the handbook portion of the Food Stamp Manual (Chapter 63-1100).



Counties which are using substitutes for any of the 16 state forms previously transmitted for implementation and which have not submitted form modification requests, must do so immediately. Should you have any questions about this policy or the procedure for submitting a request, please contact your Food Stamp Program Operations Consultant at (916) 322-5475.

Sincerely,

KYLE S. McKINSEY Deputy Director

Attachment

FOOD STAMP PROGRAM FORM MODIFICATION POLICY

July 6, 1981

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FOOD STAMP PROGRAM FORM MODIFICATION POLICY

Overview

The Food Stamp Program Management Branch (FSPMB) goal for the food stamp forms program is to increase program effectiveness, efficiency and equity. One of the means to achieve this goal is to provide statewide quidelines for form usage by designating all forms as: 1) required - no substitutes, 2) required - substitutes permitted, or 3) recommended, in accordance with the FSPMB criteria for designating forms (see Appendix 1).

The FSPMB form modification policy provides the flexibility to meet individual county needs, while ensuring that the program's goals are met. Where county modification of a state form is required to meet or enhance program goals and the related justification has not been specifically provided for in this policy, the county should submit the request for FSPMB consideration.

The review of any county modification request is separated into two levels:

1) the overall justification for not using the state form, and 2) adherence to specific standards for any variations from the state form. The evaluation criteria for each level of review are determined by the designation of the state form being modified and the form's preparation and interface (manual or computer). For each designated form, specific modification criteria is provided (Appendix 3) indicating where variations will not be considered for each of the form's components; i.e., placement, language and data elements.

Required Form - No Substitutes

1. Overall justification for not using the state form.

Acceptable justification includes:

- Form is computer-generated (EDP only).
- County has state hearing intake at the local level (EDP and Manual).
- County has different contact point than is specified on the state form (EDP and Manual).
- County has high frequency payment system (EDP only).

All other justifications are unacceptable,

2. Variation Standards

Variations in placement and data elements, where allowable, will be evaluated against the following standards after the overall justification is accepted.

All variations in placement and data elements must:

- Be clear.

 Contain all required data elements on the state form within the system (for example, computer-generated notices of action may print out only applicable message(s), but all messages must be contained within the computer program).

Variations in language will be permitted only as described below, and will be evaluated against the following standards.

All language variations must:

- Be clear.
- Use common program language.
- Be required by the special county circumstance which provides the overall justification for modification (for example, state hearing intake at the local level, high frequency payment system), or
- Be required to present a logical explanation to the client by interfacing with additional information provided by the county (for example, inclusion of the budget computation on a Notice of Action).

Required Form - Substitutes Permitted

1. Overall justification for not using the state form.

Acceptable justification includes:

Function of the form is computerized, such as Budget Worksheet (EDP only).

In addition to the above justification, counties with the above EDP justification must provide one or more of the following types of justification for any variances from the state form. Manual counties must provide one of the following as overall justification for not using the state form:

- Form is not computerized, but EDP interface requires modification (EDP and Manual).
- County has state hearing intake at the local level (EDP and Manual).
- County has high frequency payment system (EDP and Manual).
- Additional county-specific information is required for processing, gathering data, etc., (EDP and Manual).
- The addition of information will eliminate other forms (EDP and Manual).
- Modification will contribute to county-specific error reduction (EDP and Manual).
- Modification will result in cost savings (EDP and Manual).

- Modification is required by county's organizational structure (EDP and Manual).
- Modification will contribute to increased efficiency (EDP and Manual).

Examples of unacceptable justification include:

- County wishes to vary placement, language or data elements (EDP and Manual).
- Internal procedures/instructions would have to be revised (EDP and Manual).
- County has own form for purpose of state form (EDP and Manual).

2. Variation Standards

Variation in placement, language and data elements, where allowable, will be evaluated against the following standards after the overall justification has been accepted.

All variations must:

- Be clear.
- Be in accord with regulatory requirements.
- Ensure consistent treatment of recipients from county to county.
- Use common program language (such as "gross income", standard deductions", "excess shelter costs", etc.).
- Provide adequate audit trail and documentation.
- Be in an order that achieves an accurate computation or a logical explanation to clients.
- Not have the potential to create errors.
- Provide adequate space for documentation/computation where necessary.
- Contain all data elements on the state form unless they are contained elsewhere in the case file, are deleted due to a combination, or are unnecessary for the specific county (explanation from county is required).
- Reflect the intent of the state form.

Recommended Form, No State Form, State Form Not Yet Designated

- 1. Overall justification.
 - No justification is required for forms in these categories.

2. Forms will be evaluated against the following standards.

All forms must:

- Be clear.
- Be in accord with applicable regulatory requirements.
- Ensure consistent treatment of recipients from county to county.
- Use common program language.
- Be in an order that presents a logical explanation to clients.
- Not have the potential to create errors.

Exemptions from Form Modification Policy

- 1. Manual Section 63-300.2 specifies that overprinting of required forms for the following purposes is acceptable and does not require prior state approval:
 - To identify CWD.
 - To add information to the "County Use Only" section.
 - To add EW instructions.
- 2. Local printing of forms on regular, colored or larger paper does not require prior state approval as long as camera-ready copies provided by the state are used and no modifications are made beyond those listed in (1) above.
- 3. Internal county forms which do not involve the determination or notification of eligibility or benefit level, or the notification of client rights and responsibilities need not be submitted for review.

Extensions of Time to Implement

Implementation schedules for state forms generally provide adequate lead time for counties to achieve timely implementation. In those cases where timely implementation is not possible, counties must request an extension of time to comply providing any supporting justification and an estimate of the additional time required to achieve implementation.

Examples of acceptable justification include:

- Time required to reprogram EDP system.
- Time required to print forms locally when a modification is approved.
- Time required to revise procedures and train staff.

County Modification Requests

Requests will be considered on a county-by-county basis, except for case data counties which will be considered as one system. Counties within the case data system which require modifications from the approved system will be considered separately.

Any request for modification must contain the following:

- 1. Overall justification for the modification as described under acceptable justification.
- 2. An explanation of deletions or combinations of data elements. Any additional information which would assist in evaluating the variations should be provided.
- 3. A copy of the modified form.

Note: All counties using computerized forms must submit modification requests after either making the necessary programming changes to comply with the state form or determining that variations are required. All applicable messages must be submitted for approval as well as a sample computergenerated form showing the format which will be used. Only the portion of each message which relates to the language on the state form must be reviewed. Computerized explanations which would be entered in blank spaces if the state form were used are not subject to review or standardization unless the county requests such a review.

County modification requests should be sent to the Food Stamp Program Operations Bureau. Requests will be reviewed by the FSPMB and counties will be notified of the results of the review within 30 days of receipt of the request.

Form Designations

Required Form-No Substitutes

Forms assigned to this category meet one or more of the following criteria:

- 1) The specific form or its function is required by regulation or law.
- 2) The state form is a modification of an FNS-required form.
- 3) Uniformity is necessary in gathering or reporting data.
- 4) The form is used to communicate regulatory information to clients.
- 5) The form involves the determination, documentation or notification of client eligibility.

Forms typically assigned to this category include applications, most notices of action, state or federal reports.

Required Form-Substitutes Permitted

Forms assigned to this category meet: (1) one or more of the criteria for a required form-no substitutes; and (2) one or more of the following criteria:

- 1) The specific form or its function is required by regulation or law, but the form contains optional items.
- 2) Some county organizational structures are not compatible with the state form as designed.
- 3) The potential of operational incompatibility with some counties' systems is identified during the development/revision process.

Forms typically assigned to this category include worksheets, some notices of action and issuance-related forms.

Recommended Forms

Forms assigned to this category meet one or more of the following criteria:

- 1) The form does not involve the determination, documentation or notification of client eligibility.
- 2) The form or its content is not required by regulation or law.

Forms assigned to this category will not generally be developed and printed by the FSPMB.

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APPENDIX 2

Definitions

Data Element - Each independent unit of information is considered a data element for purposes of identifying form-specific modification criteria. In some cases a data element is a single word, such as "date", and in other cases a data element is a complete message, such as, "If you have any questions, please contact me".

Form Designation - Required form-no substitutes, required form-substitutes permitted, and recommended form are the three form designations used under this policy.

Form Modification - Except as provided under "Exemptions from Modification Policy", any designated form used by a county which has been altered in any way or which has not been obtained from state-printed stocks is considered a form modification. This includes, but is not limited to, computer-generated forms and county-printed forms where either a state-provided camera-ready copy was not used or the camera-ready copy was altered.

Form-Specific Modification Criteria - For each designated form, variations in placement, language and data elements which will not be considered are identified under form-specific modification criteria. The development of these criteria is based upon the reasons for assigning a form its designation.

Internal County Form - A form required for internal county use which does not involve the determination or notification of eligibility or benefit level, or the notification of client rights and responsibilities is considered an internal county form and is not subject to review under this policy. Some examples of internal county forms are route slips, some verification forms, and case narratives.

<u>Justification</u> - The overriding county-specific situation presented as the reason for modifying a state-required form is a justification. Acceptable justifications for each category of form designation are provided in this policy.

<u>Language</u> - The specific wording used on a form is considered language for purposes of identifying form-specific modification criteria.

<u>Placement</u> - The order of data elements as they appear on a form is considered placement for purposes of identifying form-specific modification criteria.

Recommended Form - Forms assigned this designation are optional county forms. Should a county elect to modify a recommended form, the modification must be reviewed by the FSPMB to ensure that the modifications meet the variation standards for a recommended form.

Required Form-No Substitutes - Forms assigned this designation must be implemented by all counties unless a modification request, based on acceptable justification for a form with this designation, is approved by the FSPMB.

Required Form-Substitutes Permitted - Forms assigned this designation must be implemented by all counties unless a modification request, based on acceptable justification for a form with this designation, is approved by the FSPMB.

<u>Variation Standards</u> - Where acceptable justification is provided and where modification is permitted, variation standards are the guidelines used to review specific modifications to ensure that program goals are met.

Variations - Any deviations from the placement, language or data elements on the state form are considered variations. Allowable variations, when overall form modification is justified, are identified for each designated form.

Form-Specific Modification Criteria

For each designated form, the specific modification criteria define the portions of a given form which may not be modified regardless of the justification. These criteria are based upon the regulatory and administrative needs for the form as well as the reasons the form was assigned its designation.

The criteria are also based upon the preparation or interface of the form; i.e., computer or manual. For those forms or form functions that may be computerized, the criteria is identified as EDP only, Manual only, or EDP and Manual. These criteria address only changes to the placement, and changes or deletion of the language and data elements on the state form.

The addition of data elements is permitted when acceptable justification for modifying a state form is provided, and those additions are evaluated against the variation standards outlined for the designation of the state form.

Application for Food Stamps

Required Form - No Substitutes

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).

Language - No modification permitted except that on page 6, paragraphs 1 and 2, the address for submitting a hearing request may be changed in counties with state hearing intake at the local level (EDP and Manual).

Data Elements - No modification permitted (EDP and Manual).

Food Stamp Budget Worksheet

Required Form - Substitutes Permitted

- Placement The order of the computation (Sections A-E) may not be modified though the data entry elements within Sections A and B may be modified (Manual only).
 - The order of the computation (Sections A-E) may be modified due to EDP requirements as long as the result is correct (EDP only).
- Language Regulatory language in Sections A-E may not be modified although additions will be considered (EDP and Manual).
- - The following data elements may not be deleted from the system; case name, case number, all data elements in Sections A-I, Sections A and F of the Change Worksheet (EDP only).

All other data elements may be modified if documented elsewhere in the case record/system (EDP and Manual).

Food Stamp Application - Special Medical Deductions

Required Form - No Substitutes

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).

Language - No modification permitted (EDP and Manual).

Data Elements - No modification permitted (EDP and Manual).

Food Stamp Budget Worksheet - Special Medical/Shelter Deductions

Required Form - Substitutes Permitted

- Placement The order of the computation (Sections A-F and Section G-3) may not be modified though the data entry elements within Sections A and B may be modified (Manual only).
 - The order of the computation may be modified due to EDP requirements as long as the result is correct (EDP only).
- Language Regulatory language in Sections A-E may not be modified although additions will be considered (EDP and Manual).
- Data Elements The following data elements may not be deleted from the form: case name, case number, all data elements in Sections A-I, first month budget column, verification/explanation column, EW and Supervisor signature blocks, classification, issuance, Sections A and F of Change Worksheet (Manual only).
 - The following data elements may not be deleted from the system: case name, case number, all data elements in Sections A-I, Sections A and F of the Change Worksheet (EDP only).
 - All other data elements may be modified if documented elsewhere in the case record/system (EDP and Manual).

Food Stamp Program Identification Card

Required Form - Substitutes Permitted

- Placement Modification permitted to accommodate data element revisions (EDP and Manual).
- Language No modification permitted to regulatory language; i.e., head of household, authorized representative (EDP and Manual).
- Data Elements No modification permitted except (1) serial numbers and photos may be added; and, (2) data elements for signature of emergency authorized representative, number of persons in household, and household eligible for delivered meals may be deleted (EDP and Manual).

Replacement Authorization/Affidavit for Authorization to Participate Card (ATP) or Food Coupon Books

Required Form - Substitutes Permitted

Placement - No modification permitted.

Language - No modification permitted except that non-ATP counties may delete all language concerning ATPs.

Data Elements - No modification permitted except that non-ATP counties may delete all data elements concerning ATPs.

Food Stamp Notice of Action and Right to Request a State Hearing

Required Form - No Substitutes

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) references on the front and back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; (2) the contact person may be modified; and (3) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level (Manual only).
 - No modification permitted except (1) references on the front and back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; (2) the contact person may be modified; (3) on the back, the address for submitting a hearing may be modified in counties with state hearing intake at the local level; (4) denial message may be modified to identify an application/reapplication for the Food Stamp Program; (5) references to "month" may be modified to accommodate a high frequency payment system; and, (6) message endings may be modified to accommodate the inclusion of a budget computation (EDP only).

Data Elements - No modification permitted (Manual only).

- No modification permitted except that all data elements need not appear on one form; i.e., computer prints out only applicable message(s), but all messages are contained in the computer program (EDP only).
- Other The NA 990 (general Notice of Action) may be used as a master for the computer paperstock for this notice (EDP only).

Food Stamp Notice of Expiration of Certification and Right to Request a State Hearing

Required Form - No Substitutes

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; (2) the contact person may be modified; (3) on the back, the address may be modified in counties with state hearing intake at the local level; and, (4) the wording in message 3 may be modified to accommodate the deletion of any optional data elements (EDP and Manual).
- Data Elements No modification permitted except that any option in message 3 not provided by the county may be deleted (Manual only).
 - No modification permitted except (1) any option in message 3 not provided by the county may be deleted; and, (2) all data elements need not appear on one form; i.e., computer prints out only applicable message(s), but all messages are contained in the computer program (EDP only).
- Other The NA 990 (general Notice of Action) may be used as a master for the computer paperstock for this notice (EDP only).

Food Stamp Notice of Approval/Food Stamp Notice of Expiration of Certification and Right to Request a State Hearing

Required Form - No Substitutes

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; (2) the contact person may be modified; (3) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (4) the wording in message 3 may be modified to accommodate the deletion of any optional data elements (Manual only).
 - No modification permitted except (1) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; (2) the contact person may be modified; (3) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; (4) the wording in message 3 may be modified to accommodate the deletion of any optional data elements; and, (5) the wording in message 1 may be modified to accommodate the inclusion of a budget computation (EDP only).
- Data Elements No modification permitted except that any option in message 3 not provided by the county may be deleted (Manual only).
 - No modification permitted except (1) any option in message 3 not provided by the county may be deleted; and, (2) all data elements need not appear on one form; i.e., computer prints out only applicable message(s) but all messages are contained in the computer program (EDP only).
- Other The NA 990 (general Notice of Action) may be used as a master for the computer paperstock for this form (EDP only).

Food Stamp Notice of Request for Repayment of Extra Food Stamps and Right to Request a State Hearing

Required Form - No Substitutes

- Placement No modification permitted except the order of the identification information; i.e., case name, etc., may be modified (Manual only).
 - No modification permitted except (1) those related to EDP requirements; and, (2) the order of the identification information; i.e., case name, etc., may be modified (EDP only).
- Language No modification permitted except (1) the paragraph concerning repayment methods may be modified to include repayment by returning unused food coupons; (2) the contact person or signature may be modified; (3) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (4) the reference on the current back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (Manual only).
 - No modification permitted except (1) wording may be modified to accommodate a high frequency payment system; (2) the paragraph concerning repayment methods may be modified to include repayment by returning unused food coupons; (3) the contact person or signature may be modified; (4) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (5) the reference on the current back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (EDP only).
- Data Elements No modification permitted except (1) "interpreter needed" must be deleted; and, (2) the current back, "Your Right to Appeal this Action" must be used (Manual only).
 - No modification permitted except (1) "interpreter needed" must be deleted; (2) the current back, "Your Right to Appeal this Action" must be used; and (3) all data elements need not be on one form, i.e., computer prints out only applicable message(s) but all messages are contained in the computer program (EDP only).

Food Stamp Notice of Action Taken on Your Fraud Hearing

Required Form - Substitutes Permitted

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (2) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (Manual only).
 - No modification permitted except (1) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; (2) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; and, (3) wording may be modified to accommodate a high frequency payment system.

Data Elements - No modification permitted (Manual only).

- No modification permitted except that all data elements need not appear on one form; i.e., computer prints out only applicable message(s), but all messages are contained in the computer program (EDP only).
- Note: As counties develop procedures for fraud disqualification/recoupment and operational problems are identified which may require form modification other than described above, the FSPMB should be contacted. The allowable modifications will be determined based on the county's specific operational problems.

Food Stamp Fraud Repayment Notice

Required Form - Substitutes Permitted

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (2) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (Manual only).
 - No modification permitted except (1) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; (2) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods; and, (3) wording may be modified to accommodate a high frequency payment system.

Data Elements - No modification permitted (Manual only).

- No modification permitted except that all data elements need not appear on one form; i.e., computer prints out only applicable message(s), but all messages are contained in the computer program (EDP only.)

Note: As counties develop procedures for fraud disqualification/recoupment and operational problems are identified which may require form modification other than described above, the FSPMB should be contacted. The allowable modifications will be determined based on the county's specific operational problems.

Food Stamp Fraud Repayment Agreement

Required Form - Substitutes Permitted

Placement - No modification permitted.

Language - No modification permitted.

Data Elements - No modification permitted.

Note: As counties develop procedures for fraud disqualification/recoupment and operational problems are identified which may require form modification, the FSPMB should be contacted. The allowable modifications will be determined based on the county's specific operational problems.

Notice of Restoration of Lost Food Stamp Benefits and Right to Request a State $\overline{\text{Hearing}}$

Required Form - Substitutes Permitted

Placement - No modification permitted (Manual only).

- No modification permitted except those related to EDP requirements (EDP only).
- Language No modification permitted except (1) to accommodate county procedures for handling restorations; i.e., contact for questions or requests for installments; (2) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; and, (3) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (Manual only).
 - No modification permitted except (1) to accommodate county procedures for handling restorations; i.e., contact for questions or requests for installments; (2) on the back, the address for submitting a hearing request may be modified in counties with state hearing intake at the local level; (3) wording may be modified to accommodate a high frequency payment system; and, (4) the reference on the back to 10 days to request aid paid pending may be modified to meet the requirements of Ortiz vs. Woods and Harley vs. Woods (EDP only).
- Data Elements No modification permitted except to accommodate county procedures for handling restorations (Manual only).
 - No modification permitted except (1) to accommodate county procedures for handling restorations; and, (2) all data elements need not be on one form; i.e., computer prints out only applicable message(s) but all messages are contained in computer program (EDP only).

Nonreceipt of Authorization to Participate Document Because of Mechanical Disaster

Required Form - Substitutes Permitted

Placement - Modification permitted.

Language - Modification permitted.

Data Elements - The following data elements may not be deleted from the form: county identification, household identification, county certification of household's eligibility, and household's certification that an ATP or food coupons has not been received.

Claim Determination Worksheet

Required Form - Substitutes Permitted

Placement - Modification permitted to accommodate data element revisions.

Language - Modification permitted.

Data Elements - The following data elements may not be deleted from the form:

Items 1, 2, 3, 8, 9, 10, 12, 13, 15, 16, all signatures, and
Review by County Review Officer section. Items 11 and 14 may
not be deleted except for Issuance Verification section as long
as verification of issuance is documented elsewhere.